Exhibit

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1 2 3 4 5 6	SIDLEY AUSTIN LLP 555 West Fifth Street, Suite 4000 Los Angeles, California 90013		
7	UNITED STATES DISTRICT COURT		
9	NORTHERN DISTRICT OF CALIFORNIA		
10	SAN FRANCISCO DIVISION		
11			
12	Helene Cahen, Kerry J. Tompulis, and Merrill) Nisam,	Case No. 4:15-cv-01104-WO	
13	Plaintiffs,	DECLARATION OF BILL PAPPAS	
14	v.)		
15 16	Toyota Motor Corporation; Toyota Motor) Sales, U.S.A., Inc.; Ford Motor Company;) General Motors LLC;		
17	Defendants.		
18			
19	I D'II D		
20	I, Bill Pappas, declare as follows:		
21	1. I am employed by Ford Motor Company ("Ford"). I have a Bachelor of Science in		
22	Electrical Engineering. I have worked at Ford in various engineering positions. My current job titl		
23	is Design Analysis Engineer. I am a member of a team of technical experts who identify and addres		
24	issues that arise in individual Ford vehicles. By virtue of my position, I am familiar with Ford's		
25	design and engineering of the 2013 Ford Fusion and the 2014 Ford Escape, including the controller-		
26	area network (CAN) bus systems in the vehicles.		
27	2. I have personal knowledge of the facts set forth in this Declaration, and, if called as a		
28	witness, could and would testify competently to such facts under oath.		
	DECLARATION OF	BILL PAPPAS	

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1	3.	Neither the 2014 Ford Escape nor 2013 Ford Fusion were designed in California.
2	4.	The CAN bus system in the 2014 Ford Escape was not designed in California.
3	5.	The CAN bus system in the 2013 Ford Fusion (which is different from the CAN bus
4	system in the 2014 Ford Escape) also was not designed in California.	
5	6.	I declare under the penalty of perjury that the foregoing is true and correct.
6	7.	Executed on this 28 day of August, 2015, at Dearborn Michigan.
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9		Bill Byggen
10	ACTIVE 209819059v.1	Bill Pappas
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